

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
AMYRIS, INC., et al.,)	Case No. 23-11131(TMH)
)	
Debtors. ¹)	Jointly Administered
)	

**OBJECTION OF NAOMI WATTS TO PROPOSED CURE
AMOUNTS WITH RESPECT TO CONTRACTS NUMBERED 2600 AND 2601**

Naomi Watts, by her counsel, Rosen & Associates, P.C., as and for her objection to proposed cure amounts, respectfully states as follows:

1. The Debtors' Notice of Potential Assumption, Assumption and Assignment, or Transfer of Executory Contracts and Unexpired Leases (the "**Notice**") lists two contracts under which Ms. Watts is the counterparty. One, assigned number 2600 and titled Chief Creative Officer Consulting Agreement, dated May 25, 2022, and the other, assigned number 2601 and titled Consulting Agreement, dated April 11, 2022. The debtors have represented that the "Cure Amount" as to each is \$0.00.

2. Ms. Watts agrees that the cure amount with respect to the Consulting Agreement dated April 11, 2022, is \$0.00. However, with respect to the Chief Creative Officer Consulting Agreement, dated May 25, 2022, the cure amount is \$269,669.00.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of the Debtor Amyris, Inc.'s principle place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

3. Under the Chief Creative Officer Consulting Agreement, Ms. Watts provided certain services as Chief Creative Officer, including, generally leading the creative strategy for the STRIPES brand with respect to certain product categories (such as skincare, haircare, or personal care products). In addition, she assisted in the development of the brand's business plan. The debtor Amyris, Inc. agreed to compensate Ms. Watts for her services and the cure amount of \$269,669.00 represents the amount of compensation due her under this agreement.

Dated: November 7, 2023

Rosen & Associates, P.C.

/s/ Christine McCabe
Christine McCabe (DE Bar No. 3695)

4609 Bedford Boulevard
P.O. Box 7560
Wilmington, Delaware 19803
Telephone: (212) 233-100
Email: cmccabe@rosenpc.com

Attorneys for Naomi Watts